

IN THE UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

GREGORY THOMAS BERRY, *et al.*, :  
Plaintiffs, :  
v. : Civil Action No.: 3:11CV754  
LEXISNEXIS RISK & INFORMATION :  
ANALYTICS GROUP, INC., *et al.*, :  
Defendants. :  
:

**JOINT MOTION TO CORRECT MISREPRESENTATIONS OF THE WATTS  
GUERRA, L.L.P. OBJECTOR GROUP**

Plaintiffs Gregory Thomas Berry, Summer Darbonne, Rickey Millen, Shamoon Saeed, Arthur B. Hernandez, Erika A. Godfrey and Timothy Otten, individually and on behalf of all others similarly situated, (“Plaintiffs”), and Defendants Reed Elsevier Inc., LexisNexis Risk Solutions FL Inc., and LexisNexis Risk Data Management, Inc. (“Defendants”) (collectively, “the Parties”) respectfully file this Joint Motion to Correct Misrepresentations of Attorney Ryan Thompson (“Thompson”) and his law firm, Watts Guerra, L.L.P. (collectively “Watts Guerra”). The reasons supporting the Motion are stated more fully in the accompanying memorandum.

WHEREFORE, the Parties, by counsel, respectfully requests that the Court enter an Order: (1) granting their Joint Motion to Correct Misrepresentations of the Watts Guerra, L.L.P. Objector Group; (2) entering the proposed Order Granting Emergency Relief attached as Exhibit F to their Joint Memorandum in Support; (3) awarding the Parties their costs and expenses incurred herein; and (4) granting the Parties such further relief as the Court deems appropriate.

**GREGORY THOMAS BERRY, SUMMER  
DARBONNE, RICKEY MILLEN,  
SHAMOON SAEED, ARTHUR B.  
HERNANDEZ, ERIKA A. GODFREY, AND  
TIMOTHY OTTEN, individually and on  
behalf of all others similarly situated**

By:/s/Leonard A. Bennett

Leonard A. Bennett  
Virginia State Bar No. 37523  
CONSUMER LITIGATION  
ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1A  
Newport News, Virginia 23601  
Telephone: 757-930-3660  
Facsimile: 757-930-3662  
Email: lenbennett@clalegal.com

Michael A. Caddell  
Cynthia B. Chapman  
Craig C. Marchinado  
CADDELL & CHAPMAN  
1331 Lamar St., Suite 1070  
Houston, TX 77010  
Telephone: 713-751-0400  
Facsimile: 713-751-0906  
Email: mac@caddellchapman.com  
Email: cbc@caddellchapman.com  
Email: ccm@caddellchapman.com

James Arthur Francis  
FRANCIS & MAILMAN PC  
Land Title Building  
100 S Broad Street 19th Floor  
Philadelphia, PA 19110  
Telephone: 215-735-8600  
Facsimile: 215-940-8000  
Email: jfrancis@consumerlawfirm.com

**LEXISNEXIS RISK SOLUTIONS FL, INC.,  
LEXISNEXIS RISK DATA MANAGEMENT,  
INC., AND REED ELSEVIER, INC.**

By:/s/David N. Anthony

David Neal Anthony  
Virginia State Bar No. 31696  
TROUTMAN SANDERS LLP  
Troutman Sanders Bldg  
1001 Haxall Point  
Richmond, VA 23219  
Telephone: 804-697-5410  
Fax: 804-698-5118  
Email: david.anthony@troutmansanders.com

Ronald Irvin Raether, Jr.  
FARUKI IRELAND & COX PLL  
500 Courthouse Plaza SW  
10 N Ludlow St.  
Dayton, OH 45402  
Telephone: 937-227-3733  
Facsimile: 937-227-3717  
Email: rraether@fclaw.com

James Francis McCabe  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105-2482  
Telephone: 415-268-7011  
Facsimile: 415-268-7522  
Email: jmccabe@mofo.com

*Counsel for Defendants*

Dale Wood Pittman  
Virginia State Bar No. 15673  
THE LAW OFFICE OF DALE W.  
PITTMAN, P.C.  
The Eliza Spotswood House  
112-A W Tabb St.  
Petersburg, VA 23803-3212  
Telephone: 804-861-6000  
Facsimile: 804-861-3368  
Email: dale@pittmanlawoffice.com

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on the 21st day of October, 2013, I electronically filed the foregoing Joint Motion to Correct Misrepresentations of Attorney Ryan Thompson and Watts Guerra, L.L.P. with the Clerk of Courts using the CM/ECF system, which will send notification of such filing to CM/ECF participants, and I hereby certify that I have mailed by United States Postal Service the document to any non-CM/ECF participants.

/s/Leonard A. Bennett  
Leonard A. Bennett  
Virginia State Bar No. 37523  
*Counsel for Plaintiffs*  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1A  
Newport News, Virginia 23601  
Telephone: 757-930-3660  
Facsimile: 757-930-3662  
Email: lenbennett@clalegal.com

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